

Ackerman, Joyce

From: Long - CDPHE, Brian <briant.long@state.co.us>
Sent: Thursday, December 21, 2017 10:49 AM
To: rdean@stratuscompanies.com
Cc: tjkrasovec@geosyntec.com; dfolkes@geosyntec.com; tmoore@actenviro.com; Brandon Sinkbeil; Ackerman, Joyce; Fronczak, David; Curtis Stovall - CDPHE; Edward Smith - CDPHE; David Walker; martin.ograde@state.co.us; Doug Ikenberry - CDPHE; jason.king@coag.gov; bfrissell@co.weld.co.us; tbjerkaas@erieco.gov; jsteeler@sennlaw.com
Subject: Inspection Documentation - Neuhauser Landfill 12/08/17
Attachments: NOI Cover Letter - Neuhauser Landfill 120817.pdf; Inspection Documentation - Neuhauser Landfill 120817.pdf

Mr. Dean,

Please find the attached cover letter and inspection documentation for the recently conducted inspection at the Neuhauser Landfill/Redtail Drum Remediation Site. I will only plan to issue this electronically unless hard copies are specifically requested. Please don't hesitate to contact me should you have questions about this information or about the attached inspection documentation.

Thanks,

Brian T. Long
Environmental Protection Specialist
Solid Waste Compliance Assurance Unit
Solid Waste and Materials Management Program



COLORADO

**Hazardous Materials
& Waste Management Division**

Department of Public Health & Environment

P 303.691.4033 | F 303.759.5355

briant.long@state.co.us | www.colorado.gov/cdphe/hm



COLORADO

Department of Public
Health & Environment

Dedicated to protecting and improving the health and environment of the people of Colorado

December 21, 2017

Mr. Richard Dean
Stratus Redtail Ranch, LLC
8480 E. Orchard Road, Suite 1100
Greenwood Village, CO 80111

Re: Neuhauser Landfill - Inspection, December 8, 2017
SW corner of Co. Rd. 5 and Co. Rd. 6, South of the Old Erie Landfill, Erie, CO 80516
SW/WLD/NEU 1.2

Dear Mr. Dean:

On December 8, 2017, Brian Long, a representative of the Hazardous Materials and Waste Management Division of the Colorado Department of Public Health and Environment (the Division), conducted an inspection of the Neuhauser Landfill/Redtail Drum Remediation Site located in Erie, Colorado (the Facility). The purpose of the inspection was to determine the Facility's compliance with the minimum standards of the Solid Wastes Disposal Sites and Facilities Act, Title 30, Article 20, Part 1, C.R.S., as amended (the Act), the Regulations Pertaining to Solid Waste Sites and Facilities, 6 CCR 1007-2 (the Regulations), and the Facility's Site Management Plan.

Based upon information provided by the Facility and observations made during the inspection, the Division has determined the Facility to be in compliance with the Act, the Regulations, and the Site Management Plan at the time of the inspection. A couple of compliance assistance items were discussed with onsite personnel during this inspection event and are noted on the inspection documentation. It is important that these items be considered and addressed to prevent the Facility receiving a compliance advisory during future inspection events. Copies of the notice of inspection and inspection checklists are enclosed for your reference.

Should you have questions, I may be reached at (303) 691-4033 or briant.long@state.co.us.

Sincerely,

Brian T. Long
Environmental Protection Specialist
Solid Waste and Materials Management Program
Hazardous Materials and Waste Management Division

ecc: Tom Krasovec, Geosyntec
Tobi Moore, ACT
Joyce Ackerman, US EPA
Curt Stovall, CDPHE HMWMD
David Walker, CDPHE HMWMD
Doug Ikenberry, CDPHE HMWMD
Ben Frissell, Weld County
Jonathan Steeler, SVC P.C.

Dave Folkes, Geosyntec
Brandon Sinkbeil, DS Consulting
David Fronczak, US EPA
Ed Smith, CDPHE HMWMD
Martin O'Grady, CDPHE HMWMD
Jason King, CO AGO
Todd Bjerkaas, Town of Erie





Colorado Department
of Public Health
and Environment

Colorado Department of Public Health and Environment
Hazardous Materials and Waste Management Division
4300 Cherry Creek Drive South, Mail Code HMWMD-B2, Denver, CO 80246-1530
(303) 692-3320 <http://www.colorado.gov/cdphe/solidwaste>

Solid Waste and Materials Management Program
Notice of Inspection

Facility Name <u>NEUHAUSER LANDFILL</u>	Facility ID	Date <u>12/8/17</u>
File Code <u>SW/WLD/NEU</u>		
Street <u>SOUTH OF OLD RAIN LANDFILL</u> <u>SW CORNER OF CO RD 6 + CO RD 5</u>	Inspection Announced? () Yes <input checked="" type="checkbox"/> No	Time In: <u>8:45 AM</u>
City <u>ERIE</u> County <u>WELD</u> Zip <u>80516</u>	Enter by: <input checked="" type="checkbox"/> Consent () Warrant () Open Fields	Time Out: <u>12:15 PM</u>
Facility Representatives: <u>TOBI MOORE - ACS General Manager</u> <u>TOM HOUTZFASTER - DS CONSULTING</u> <u>JACKIE ROWLEY - GROSSINTEL</u> <u>TOM KRAVOVIC - GROSSINTEL</u>	Phone <u>303-517-8815</u>	Email <u>tmoore@actenviro.com</u>
Local Government Representatives <u>N/A</u>	Phone	Email

Inspection Result:

- ☒ No Violations Observed
☐ Minor Violations Noted Below
☐ Minor Violations, Compliance Advisory Issued
☐ Major Violations Identified

Compliance Assistance Delivered During the Inspection:

- ☒ Yes ☐ No; If yes, describe:
- DISCUSSED REQUIREMENTS FOR ASBESTOS
MANAGEMENT W/ ON-SITE CORP; SPECIFICALLY
RELATING TO AREAS WHERE DUMPS ARE PRESENT
AND WHERE DUMPS ARE NOT PRESENT

Apparent Violations and requested corrective actions:

NONE

- DISCUSSED REQUIREMENT FOR TRAINING TO
BE PROVIDED TO ON-SITE STAFF IN ACCORDANCE
W/ SECTION 55.3 OF THE RCRA AS WELL AS
SECTION 4.2 OF THE SRR MGMT PLAN

Inspection Type:

- ☐ Complaint ☐ Enforcement Follow-up
☒ Routine Compliance Inspection ☐ Environmental Covenant
☐ Compliance Assistance Visit ☐ File/Records Review
☐ Sampling

Signature of Facility Representative Receiving Form: <u>[Signature]</u>	Lead CDPHE Inspector: <u>Brian Long</u>
Name of Facility Official Receiving Form: <u>Tobi Moore</u>	Assisting Inspectors:



COLORADO DEPARTMENT of PUBLIC HEALTH & ENVIRONMENT
Hazardous Materials and Waste Management Division
SOLID WASTE DISPOSAL SITE AND FACILITY INSPECTION

Time In: 8:45 AM

Time Out: 12:15 PM

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Facility: NEUNHAUSE LANDFILL

Inspection Date: 12/8/17

Regulated Asbestos Contaminated Soil

Inspector(s): B. Long

Functional Category	Requirement Description	Citation	Violation Y/N/P	Note Reference
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Record Review

Scope and Applicability	Debris Characterization and Management in Accordance with Section 5.5.1 and General Solid Waste Requirements	5.5.1(A)	N	
	Soil or Ash With Known Non-Visible Asbestos is RACS and is Managed in Accordance With Regulation	5.5.1(C)		
	Exposed or Disturbed RACS Managed, Disposed of, or Reused in Accordance With Regulations	5.5.1(D)(1)		
	Removal of ACM Assoc. With a Facility Component, Below Trigger Levels, Conducted Under Section 5.5 in Accordance With AQCC Reg 8 Section III.V	5.5.1(D)(2)		
	Generated RACS Not Disposed or Reused as per 5.5.8 is Solid Waste and Shall be Managed According to Sections 5.1 through 5.4	5.5.1(D)(3)		
	Disturbed or Exposed RACS Managed in Accordance with Section 5.5, or	5.5.1(D)(4)		
	RACS Permanently Stabilized in Accordance with Section 5.5.1(D)(4)(a-e)	5.5.1(D)(4)		
	RACS that is Driven Upon Must be Kept Adequately Wet or Demonstrated to be Below Risk-Based Thresholds	5.5.1(D)(5)		
	All Equipment Surfaces in Contact with RACS Must be Decontaminated	5.5.1(D)(5)		
Personnel Training	Personnel Training	5.5.3		
Scope and Applicability	Immediate Action Taken re Unplanned RACS Discovery	5.5.4(A)		
	Notification Requirements re Unplanned RACS Discovery	5.5.4(B)		
	Interim Actions re Unplanned RACS Discovery	5.5.4(C)		
	Regulatory Approved Response to Planned RACS Management	5.5.5		
	Notified Dept of Planned RACS Management	5.5.5(i)		
	Remediation of RACS according to Approved RACS Remediation Plan	5.5.6		

Site Review

Standard Requirements for the Disturbance of RACS	Establishment and Control of a Regulated Work Area	5.5.7(A)		
	PPE for Purposes of Preventing Cross-Contamination	5.5.7(B)		
	Wetting	5.5.7(C)		
	Wind Speed Monitoring	5.5.7(D)		
	Air Monitoring	5.5.7(E)		
	Work Practices to be Followed During RACS Disturbance	5.5.7(F)		
	Loading and Placement of RACS	5.5.7(G)		
	Onsite Staging, Stockpiling, and Storage of RACS	5.5.7(H)	✓	

Facility: NEUNHAUSER LANDFILL

Inspection Date: 12/8/17

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Standard Requirements for the DI	Decontamination	5.5.7(I)	N	
	RACS Spill Response	5.5.7(J)		
	Requirements for Exposed RACS Remaining in Place	5.5.7(K)		
	Documentation	5.5.7(L)		
Packaging and Disposition of RACS	Disposal of RACS containing equal to or greater than 1 percent friable ACM	5.5.8(A)(1)		
	Disposal of RACS containing less than 1 percent friable ACM	5.5.8(A)(2)(a)		
	Disposal of RACS containing only non-friable ACM	5.5.8(A)(2)(b)		
	Requirements for Alternative Packaging of RACS	5.5.8(A)(3)		
	DO Plan Requirement for On-site Disposal of RACS Outside of AOC	5.5.8(A)(4)		
	Plan Requirement for On-site Disposal of RACS Within the AOC	5.5.8(B)(1)		
	Beneficial Re-use Plan Requirement for On-site Disposal of RACS Outside of AOC	5.5.8(B)(2)		
	Demonstration of non-RACS	5.5.8(C)		
Appendix 5A	Sampling and Analysis in Accordance with Appendix 5A	Appendix 5A	✓	

Site-Specific Design and Operation Plan Requirements:

Regulated Asbestos Contaminated Soil

Note/Regulation Reference #	Comments and Deficiency Requests	Request RTC Date	RTC Date
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